

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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MOSTAFA AHMED, a/k/a MIKE FARAG,

Plaintiff,

- against -

HEARTLAND BREWERY LLC,
JON BLOOSTEIN and CARL CLEMENTS,

Defendants.
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Docket Number:
05 CV 2652 (RCC)(HBP)

NOTICE OF MOTION

SIRS:

PLEASE TAKE NOTICE THAT upon the annexed Declaration of David E. Duhan, Esq., attorney for the Plaintiff herein, sworn to on the 22nd day of January, 2007, and the papers annexed thereto, and upon all of the pleadings and proceedings heretofore had herein, the Plaintiff will move this Court at a Part thereof to be held in the courthouse located at Foley Square, New York, New York, on the 23rd day of January, 2007, at 9:30 A.M. in the forenoon of that day, or as soon thereafter as counsel can be heard, for an Order pursuant to Rule 56 granting summary judgment to Plaintiff, dismissing Defendants' affirmative defenses, granting the relief requested herein and for an Order granting such other, further and different relief as to the Court may seem just and proper.

Dated: Kew Gardens, New York
January 22, 2007

Yours, etc.

LAW OFFICE OF DAVID E. DUHAN

By: _____s/ David E. Duhan (DD 2346)_____
DAVID E. DUHAN
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